

DNR Response to Public Comments on Section 3 of the Draft Michigan State Forest Management Plan

December 28, 2007

The Michigan Department of Natural Resources (DNR) received 41 comments that were directed to Section 3 (Current Forest Conditions, Uses and Trends) of the DRAFT Michigan State Forest Management Plan. Comments focused on a broad range of issues, response to which follow.

Comments reflect a misconception that the SFMP proposes to restore habitats to circa 1800 conditions. However, the plan expressly states at the beginning of Section 3 that current social factors preclude the restoration of many areas of the State Forest to circa 1800 conditions – with the exception being some rare community types.

Concern was expressed about cutting of older aspen stands as discussed in the timber harvest trends section, specifically whether it is appropriate to take such action without a prior assessment within the context of site conditions and successional tendencies. The discussion at the end of the aspen trends section is more appropriate to Section 4.1.2.2 of the plan where objective 3 has been modified to address this issue.

There are tradeoffs for the maintenance of high acreage of aspen. High acres of aspen are in demand from a habitat perspective (to which a number of popular game species are adapted) and from the wood products industry (for which there is an economic and social reliance). These benefits are off-set by regeneration problems for several tree, shrub and herbaceous species that are caused by excessive herbivory, and less species and stand-level structure and biodiversity. The SFMP has been modified to address this tension. Section 4.1.2.2 of the plan addresses the need to increase prescriptions in the 30-49 year age classes in order to help balance the age class distribution for a more steady supply of fiber in support of industry and early successional habitat.

A suggestion was made that the SFMP should specifically address die off of red pine predominantly to the south of US-10. This issue was assessed by the DNR and U.S. Forest Service and not deemed to be a systemic epidemic but rather a decline caused by the confluence of a number of other factors.

The issue of timber growth exceeding volume losses from removals and mortality on all ownerships was expressed. The SFMP proposes to increase harvests in certain age classes for specified species, and to conduct salvage cuts where appropriate due to incidences of insect and disease (Section 4.1.7.1). Use of salvaged ash wood is addressed in Section 4.1.2.2. The SFMP does not propose to manage the State Forest by equalizing growth to removals and mortality as not all DNR acreage is primarily managed for timber production, but

also have other uses ranging from recreation to biodiversity conservation which would preclude the utilization of all growth. The sole use of growth versus removals and mortality as a measure of sustainability is not appropriate since that standard would ignore other social, economic and ecological factors of sustainability.

Comments noted the potential succession of half of the oak cover type, for which regeneration of the type has been problematic. The SFMP states that maintenance of the current acreage of oak is not possible since the current acreage is a result of large-scale removals and fires in the past century. Inventory trends show that future oak acres will likely exist as a part of a mixed pine-oak cover type. The plan directs prescriptions in the 70-90 year age classes for purposes of regenerating the species. This is reflected in the objectives of Section 4.1.2.2 of the SFMP.

There is no consideration for the DNR to dedicate 10 percent of the State Forest to grasslands. The current acreage is 3.2 percent of the forest, which is greater than the historic acreage of circa 1800. Specific objectives in Section 4.1.2.1 direct the expansion and restoration of savanna communities as well as maintaining old field grassland habitat.

Cooperation between the DNR and the Department of Agriculture for unified actions to address invasive species on private lands was suggested. However, the scope of this State Forest Management Plan does not extend to private land programs.

Comments expressed that there was inadequate emphasis upon forest health and that Section 3.2 focused too narrowly on tree health. Additional discussion was added to broaden the introduction of the section to other forest health issues. Comments also recommended the use of ash resources impacted by the Emerald Ash Borer. This is already included in the plan, where salvage cuts are provided in Objective 3 of Sect 4.1.7.1 and the use of salvaged ash is addressed in Objective 35 of Sect 4.1.2.2.

Comments recommended a discussion on the past and current impact of preferential browse by deer and elk. The DNR has formed a Cervid Herbivory Team that is tasked with measuring the scope and severity of browse on State Forest lands. A discussion of this issue has been added to section 3.2 and an objective has been added to Section 4.1.2.2.

Comments stated that provisions of specific management strategies for forest habitat were not adequately addressed in the SFMP. The DNR Wildlife Division agrees that providing key habitat requirements of the various species of wildlife that require woodland habitat on state forests should be a priority of the Department. Michigan's wildlife community is very diverse, and includes hundreds of species. However, it is not within the scope of the State Forest

Management Plan to outline specific habitat management activities used to influence that habitat for each of those species. The DNR has adopted a Wildlife Action Plan (WAP) to address the habitat requirement necessary for the conservation of wildlife species, which is referenced in Sections 3.3 and 4.1.2.3 of the SFMP. Within this context, the Biodiversity Stewardship Area category of HCVA will help address the WAP coarse filter conservation strategy by identifying and managing representative natural communities across the landscape.

Several comments suggested the need for more discussion of the social and economic impacts of the forest products, and hunting and trapping industries. Additional discussion was added to Section 3.5.3 to address this need.

Concern was expressed regarding the amount and source of DNR expenditures for purposes of research. Funding for DNR research programs addresses many needs necessary for the continued conservation, protection and management of the State's natural resources, including forest health and productivity, water quality, fish and wildlife species and habitat needs, and landscape-level ecology. Funding for these programs comes from a broad number of sources, including Federal Pitman-Roberson and State Wildlife Grant funds, the State of Michigan's Game and Fish Fund, as well as the combined Federal and State Sport Fishing Restoration Fund.